

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE: KRISJENN RANCH, LLC, <i>et al</i> DEBTOR	§ § § § § §	CHAPTER 11 CASE NO. 20-50805-rbk (Jointly Administered)
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**DEBTORS' SECOND JOINT EXPEDITED MOTION TO EXTEND
DEBTORS' EXCLUSIVITY PERIOD**

DEBTORS HAVE REQUESTED EXPEDITED CONSIDERATION OF THIS MOTION AND HAS REQUESTED THAT A HEARING BE HELD ON THIS MOTION AT THE COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS MOTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS

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TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC, KrisJenn Ranch, LLC Series Pipeline ROW, and KrisJenn Ranch, LLC Series Uvalde Ranch's (the "Debtors"), Debtor and Debtors-in-Possession, hereby file this *Second Joint Motion to Extend Debtors' Exclusivity Period* (the "Motion") and in support, respectfully represent as follows:

PROCEDURAL BACKGROUND

1. On April 27, 2020, (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1330 (as amended, the "Code"). The Debtors continue to manage their financial affairs as a debtors-in-possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code. No creditors' committee has yet been appointed in this case by the United States Trustee. No trustee or examiner has been requested or appointed.

JURISDICTION AND VENUE

2. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(1), (b)(2)(A) and (M). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408(1) because the Debtors' places of business have been located in this district for more than 180 days preceding the filing of this bankruptcy case.

BACKGROUND AND REQUEST FOR RELIEF

3. Debtors, KrisJenn Ranch, LLC and Series Uvalde Ranch, purchased the KrisJenn Ranch (the "Ranch") in 2013 for \$3,952,000 and then invested an additional \$840,000 in the Ranch. The Ranch derives its income from the sale of cattle and a white-tail deer hunting lease operation.

4. The Ranch and a 60-mile pipeline and right of way (the "Pipeline") are encumbered by a \$5.9 million loan from Mcleod Oil ("Mcleod") related to an investment in a pipeline and its right of way. Longbranch Energy, L.P. ("Longbranch") and DMA Properties, Inc. have claimed disputed interests in the Pipeline. The issues regarding the pipeline are being litigated in Adversary Number 20-05027, which was set for trial on December 7, 2020. This trial date has since been continued to January 11, 2021. Debtors need to resolve the litigation to determine the terms for their plan of reorganization.

5. Pursuant to this Court's order on Debtors' Joint Expedited Motion to Extend Debtors' Exclusivity Period by 90 Days signed August 17, 2020 (Dckt No. 73), Debtors' exclusivity period is set to terminate on November 25, 2020. After notice and hearing, this Court has the inherent authority to extend the 120-day period. *See* 11 U.S.C. 1121(d).

6. Once the litigation is resolved, a confirmable plan will be promptly filed; however, at this juncture, a plan proposed would likely be significantly different from the final plan resulting in unnecessary expense. Debtors are requesting a second extension in the exclusivity period until February 11, 2021, due to the postponed trial date. Therefore, Debtors request the court extend exclusivity for filing their plans until February 11, 2021, and to solicit and confirm their plan until April 25, 2021.

CERTIFICATE OF CONFERENCE

The undersigned certifies that he conferenced with the United States Trustee and counsel for Mcleod Oil, Longbranch, and DMA via email. Counsel for DMA and Longbranch is unopposed and the other counsels have not yet taken a position on the motion.

PRAYER

WHEREFORE, PREMESIS CONSIDERED, the Debtors pray that the Court set this motion for hearing and, upon said hearing, extend exclusivity for filing Debtors' plans until February 11, 2021, and exclusivity to solicit and confirm their plans until April 25, 2021, and for such other and further relief that the Court deems justified.

Dated: November 5, 2020

Submitted By:
MULLER SMEBERG, PLLC

By: /s/ Ronald J. Smeberg
RONALD J. SMEBERG
State Bar No. 24033967
111 W. Sunset Rd.
San Antonio, Texas 78209
210-664-5000 (Tel)
210-598-7357 (Fax)
ron@smeberg.com
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2020, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg

RONALD J. SMEBERG

SERVICE LIST

DEBTOR

KrissJenn Ranch, LLC
410 Spyglass Rd
Mc Queeney, TX 78123-3418

GOVERNMENT ENTITIES

Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-1539

U.S. Attorney
Attn: Bkcy Division
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026 AUS
Austin, TX 78701

Texas Comptroller of Public Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

Angelina County Tax Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas 75961

Rusk County
202 N Main St,
Henderson, Texas 75652

Shelby County, Tax Collector
200 St. Augustine St.

Center, Texas 75935

Tenaha ISD Tax Assessor-Collector
138 College St
Tenaha, TX 75974-5612

Uvalde Tax Assessor
Courthouse Plaza, Box 8
Uvalde, Texas 78801

NOTICE PARTIES

METTAUER LAW FIRM
c/o April Prince
403 Nacogdoches St Ste 1
Center, TX 75935-3810

Albert, Neely & Kuhlmann
1600 Oil & Gas Building
309 W 7th St
Fort Worth, TX 76102-6900

Laura L. Worsham
JONES, ALLEN & FUQUAY, LLP
8828 Greenville Ave.
Dallas, Texas 75243

Craig Crockett
CRAIG M. CROCKETT, PC
5201 Camp Bowie Blvd. #200
Fort Worth, Texas 76107

Christopher S. Johns
JOHNS & COUNSEL PLLC
14101 Highway 290 West,
ste 400A
Austin, Texas 78737

Timothy Cleveland
CLEVELAND|TERRAZAS PLLC
4611 Bee Cave Road, ste 306B
Austin, Texas 78746

SECURED CREIDITORS

McLeod Oil, LLC
c/o John W. McLeod, Jr.
700 N Wildwood Dr
Irving, TX 75061-8832

UNSECURED CREIDITORS

Bigfoot Energy Services
312 W Sabine St
Carthage, TX 75633-2519

C&W Fuels, Inc.
Po Box 40
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza
755 E Mulberry Ave Ste 500
San Antonio, TX 78212-3135

Granstaff Gaedke & Edgmon
5535 Fredericksburg Rd Ste 110
San Antonio, TX 78229-3553

Hopper's Soft Water Service
120 W Frio St
Uvalde, TX 78801-3602

Larry Wright
410 Spyglass Rd
Mc Queeney, TX 78123-3418

Medina Electric
2308 18th St.
Po Box 370
Hondo, TX 78861-0370

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply
2521 E Main St
Uvalde, TX 78801-4940

Longbranch Energy
c/o DUKE BANISTER RICHMOND
Po Box 175
Fulshear, TX 77441-0175

DMA Properties, Inc.
896 Walnut Street at US 123 BYP
Seneca, SC 29678